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VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

May 28, 2021

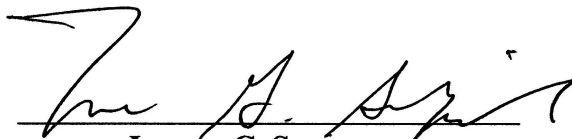
Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS):
Request to File Under Seal

Dear Judge Schofield:

We respectfully write on behalf of Plaintiff Manbro Energy Corporation ("Plaintiff"), in accordance with Paragraph I.D.3 of Your Honor's Individual Rules, to request leave to file under seal Exhibit E to the Declaration of Mark E. McDonald in Support of Plaintiff's Motion for Leave to File Second Amended Complaint (the "Exhibit"). Parties and attorneys of record who should have access to the sealed document are listed in Appendix A.

Plaintiff makes this sealing request pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020 (ECF No. 51) (the "Confidentiality Order"). The Exhibit contains an excerpt of deposition testimony deemed Confidential Information or Discovery Material, as defined in the Confidentiality Order.

Respectfully Submitted,



LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

/s/ Mark E. McDonald

Mark E. McDonald

Plaintiff's application is GRANTED. Exhibit E to the Declaration of Mark E. McDonald (Dkt. No. 82) shall remain under seal with access restricted to the parties identified in the Appendix to this filing for the reasons identified in Defendants' letter at Dkt. No. 100.

The Clerk of Court is respectfully directed to terminate the motion at Dkt. No. 79.

Dated: June 15, 2021
New York, New York

Cleary Gottlieb Steen & Hamilton LLP or an affiliated entity has an office in each of the cities listed above.

Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

Cleary Gottlieb Stein & Hamilton, LLP

Joon H. Kim

Victor L. Hou

Rahul Mukhi

Mark E. McDonald

Gibson, Dunn & Crutcher LLP

Randy M. Mastro

Mark A. Kirsch

Avi Weitzman

Casey Kyung-Se Lee